

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JOHN C. CREUZOT,

§
§
§
§
§
§
§
§

Plaintiff,

v.

Civil Action No. 3:17-cv-00404

ALVIN GREEN,

Defendant.

§
§
§
§
§
§

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR
EXPEDITED CONSIDERATION OF PLAINTIFF'S APPLICATION FOR
PRELIMINARY INJUNCTION**

Plaintiff John C. Creuzot (“Mr. Creuzot”) respectfully requests the Court grant expedited consideration of Plaintiff’s Application for Preliminary Injunction, and, if appropriate, refer consideration of the Application for Preliminary Injunction to the assigned United States Magistrate Judge.

Background

On February 22, 2017, Mr. Creuzot filed Plaintiff’s Verified First Amended Complaint and Application for Preliminary Injunction [Dkt. No. 6]. Defendant was served on February 24, 2017 [Dkt. No. 7]. Defendant Alvin Green’s answer is due on March 17, 2017, pursuant to Federal Rule of Civil Procedure 12. Defendant Green’s response to the Application for Preliminary Injunction is due on March 17, 2017, pursuant to Northern District of Texas Local Rule 7.1(e). Based on the nature of Mr. Creuzot’s Application for Preliminary Injunction, he now seeks to have the Court consider it on an expedited basis.

Argument and Authority

Mr. Creuzot is a candidate for Dallas County District Attorney, and his lawsuit involves cybersquatting by Defendant Green related to domain names using Mr. Creuzot's name in violation of federal law. Because Mr. Creuzot is actively campaigning without use of the domain names procured by Defendant Green, Mr. Creuzot requests expedited consideration and, if appropriate, referral to the assigned United States Magistrate Judge of his Application for Preliminary Injunction.¹

Prayer

Plaintiff John C. Creuzot respectfully requests the Court grant expedited consideration of Plaintiff's Application for Preliminary Injunction, and, if appropriate, refer consideration of the Application for Preliminary Injunction to the assigned United States Magistrate Judge and for such other relief in law or in equity which Plaintiff may be entitled.

¹ A district court may designate a magistrate judge to hear and submit recommendations on motions for injunctive relief. 28 U.S.C. § 636(b)(1)(A), (b)(1)(B).

Dated: March 1, 2017

Respectfully submitted,



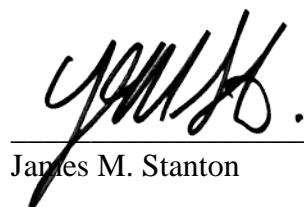
James M. Stanton
Texas State Bar No. 24037542
jms@stantonllp.com
Jennifer Salim Richards
Texas State Bar No. 24079262
jrichards@stantonllp.com

STANTON LLP
9400 North Central Expressway
Ste. 1304
Dallas, Texas 75231
Telephone: (972) 233-2300
Facsimile: (972) 692-6812

**ATTORNEY FOR JOHN C.
CREUZOT**

CERTIFICATE OF CONFERENCE

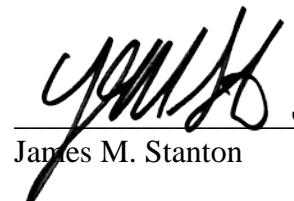
Counsel for Plaintiff sent the proposed Motion for Expedited Consideration of Plaintiff's Application for Preliminary Injunction and Memorandum in Support of Same to Defendant for review on February 28, 2017. Defendant opposed the Court hearing Plaintiff's Application for Preliminary Injunction on an expedited basis but did not state the basis for his objection.



James M. Stanton

CERTIFICATE OF SERVICE

I certify that on March 1, 2017, the foregoing instrument was served on Defendant by electronic mail at the address confirmed by Defendant.



James M. Stanton